Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
GARMIN INTERNATIONAL INC.	)	WT Docket No. RM-10762
	)	
Amendment of Section 95.29(f)(l) and	)	
95.119(a)(1)(d), 95.183 (a)(4), 95.631(a),(e) & (f)	)	
To Authorize manufacture, Sale and Use of GPS	)	
Transmission Enhanced General Mobile Radio	)	
Service Units	)	
	)	
	)	
	)	

COMMENTS ON NOTICE OF PROPOSED RULEMAKING

Comment Date September 5, 2003

To: The Commission

COMMENTS OF

Popular Wireless Magazines *also known as* GMRSWEB at

http://www.popularwireless.com

Editor-Owner, Douglas M. Smith, KAF9830, WA6GON. - Author

And On behalf of the readers of PopularWireless Magazine's
Bulletin Board Community

Introduction

GMRSWEB, now known as PopularWireless Magazines, has since 1999, provided an Internet based community where GMRS licensees could meet and discuss issues important to the operation of their family radio communication systems. The magazine is also a place for persons interested in GMRS to learn more about the radio service and how it can benefit their families. Currently the magazine bulletin board has over 1800 registered participants around the United States.

Readers of the magazine are now considering the formation of a national organization to represent GMRS licensees in many venues, a Personal and Family Radio User's Association.

Magazine Background

A. PopularWireless Magazines has supported the continued licensing of persons using GMRS. We believe after the world's experiences with the anarchy and illegal uses associated with the unlicensed 27 MHz Citizens Band that people will respect a tight spectrum resource if they are required to pay a fee to license with the FCC. We also hold that consequences should also exist for the abuses of that resource. When the magazine started publishing on the web we believed that is what the FCC also believed and this was supported by our positive experiences with the FCC Enforcement Bureau.

B. The magazine has been an advocate of FCC enforcement actions against commercial radio piracy on GMRS channels. The magazine has supported the FCC's Enforcement Bureau's efforts in this regard and we have met personally with FCC officials including Tom VanStavern of Northern California and Riley Hollingsworth in Gettysburg, PA regarding commercial piracy enforcement. Both of these FCC employees, to the Commission's credit, represent the highest standards of ethical and professional behavior and we give much of the credit for our success in fighting the interference problems associated with unlicensed commercial systems to these two excellent Commission employees and their staff of competent agents.

C. The magazine created a Code of Conduct for GMRS Licensees that is published on the web site. This Code holds that GMRS licensees should obey the Commissions GMRS rules and regulations and observe operating practices that preserve, protect, and enhance the small spectrum resource allocated to this unique service. The magazine also created a Code of Ethics and Practices for two-way radio manufacturers and dealers after we learned of some dealers that engaged in commercial practices that were having an adverse impact on the quality of communication achieved in the General Mobile Radio Service. Garmin's proposal is in conflict with this Code.

The Codes are as follows:

GMRS Licensee Code of Conduct

FCC R&R 95.1 & The Definition of the General Mobile Radio Service

"The GMRS is a land mobile radio service available to persons for short-distance two-way communications to facilitate the activities of licensees and their immediate family members. Each licensee manages a system consisting of one or more stations. "

FCC R&R 95.601, (adapted) GMRS FCC Rules provide the technical standards to which each transmitter used or intended to be used in a station authorized in the General Mobile Radio Service must comply.

By general agreement we observe the following obligations, duties, and general operating practices in order to preserve and protect this unique non-subscription radio service our families have grown to appreciate.

- Remember that the purpose of GMRS is to provide personal communication associated with the personal business and activities and of our immediate families. Respect and value the General Mobile Radio Service as a unique family communication tool of limited resource. GMRS was not intended as a radio service for hobby communication or other type of communication that would otherwise be appropriate in the Citizens Radio Service, Amateur Radio Service or on a business radio channel. (e.g. random chats, calling CQ etc.)
- Monitor radio channels before transmitting to avoid interfering with other users of the channel.
- Wait for any emergency radio messages to be completed before you transmit.
- Identify all of your GMRS radio transmissions with the FCC assigned call letters at intervals as required by FCC rules. (Grandfathered GMRS licensees share the same station identification requirement.)
- Extend courteous behavior to other licensees using the GMRS channels.
- Read and follow the FCC Rules and Regulations governing the General Mobile and Family Radio Service.
- Coordinate repeater operations including input and output tones in order to prevent mutual interference.
- Respect the property rights of others by always asking permission before using any repeater that does not belong to you. Recognize that a GMRS repeater owner not required to share their repeater with anyone. Owning a radio capable of repeater operation does not mean you and your family can use any repeater you hear.
- Observe the operating requirements defined by the repeater group or the owner/licensee of the repeater you use.
- Whenever practical, enable CTCSS 141.3 Hz on your repeater input during regular hours of operation to allow any licensee access to the repeater to report an emergency or seek traveling information. If this tone is unavailable listen in open squelch to your repeater output whenever possible. Persons traveling and using 141.3 on GMRS repeaters should always request permission to make a call for assistance.
- Monitor your repeater so that it does not cause harmful interference during a period of malfunction and so it can be shut down when malfunctioning or during an attack by unauthorized users.

- Remember that GMRS was originally created as base-to-mobile, mobile-to-base, and portable-to-portable, directed communication radio service. As of February 1999 the FCC restriction against base-to-base communication between GMRS stations was lifted. Nevertheless, GMRS licensees engaged in base-to-base communication shall yield to mobile or portable communication.
- Keep radio transmissions on high-level repeaters short to prevent monopolization of a frequency over a wide area for extended periods.
- Properly maintain a GMRS repeater so that it does not retransmit signals received from FRS radios operating on channels adjacent to the repeater input.
- Respect the occasional public service operation by a local public service team. Some organizations of licensees maintain GMRS radio systems with a specific purpose of assisting public safety agencies and providing a SkyWarn service. GMRS licensees and their communities benefit from the service these organizations provide. Such activities should be kept brief and to the point. Operators should yield to regular GMRS traffic when emergencies are not present. Amateur Radio style network activity on GMRS is discouraged.
- Identify, and report any unlicensed users of GMRS to your local GMRS Intruder Interference Committee. Report persistent unlicensed use by pirates to your local FCC Enforcement Bureau office.
- Respect and comply with the orders of commercial antenna site owners that allow a user group or individuals site access for radio equipment and antennas.
- Use standard commercial engineering practices when installing and operating GMRS radio systems, particularly systems located at commercial antenna sites. GMRS channels are located in-between commercial and public safety system channels. It is imperative that the equipment you use be maintained to commercial standard and efficiency in order to avoid improper operation and interference.
- Do not use an automatic Morse Code or voice only identifier when a repeater is not in actual use. ID'ers that identify as beacons do not respect repeater or simplex radio traffic sharing the same frequency. Use of the identifier during regular communication through the repeater is the preferred method of operating identifiers.
- NEVER operate GMRS or FRS transceivers in other countries unless permitted by that country's laws. Currently GMRS radios are not legal in any other country. U.S. Type Approved FRS radios are legal only in Canada.
- All GMRS repeater owners have the obligation to coordinate CTCSS and DPL tones in use on their systems. The last repeater owner to put a tone on his or her system changes the tone whenever a conflict arises. Tones are not left installed in a system to "hold the tone for future use." Tones cannot be reserved for users not eligible to license in GMRS e.g. public safety and disaster organizations. There shall be a current user for each activated repeater tone. If one system changes users, the date the tone was placed on the system is the date the newest licensee with that tone was placed on the system. Licensees are strongly encouraged to keep station records with this information.
- Observes the prohibition of operating GMRS radios North of Line A near the Canadian border on specified GMRS channels and in the National Radio Quiet Zone on all channels.
- If you operate on a grandfathered GMRS business repeater and you do not hold your own GMRS license and are not eligible under the license of an

immediate family member, you do not operate outside the license limitations of the grandfathered system.
- Do not interfere with or annoy grandfathered business users licensed for GMRS channels.
- The FCC expects all licensees to cooperatively resolve operational complaints between GMRS systems.
- Never operate non-type accepted radios on GMRS. e.g. modified Amateur Radio transceivers.

Radio Retailer Code of Conduct

GMRS Web and all GMRS licensees understand the value and service the radio retail, radio manufacturing, and radio service industry provide us. We encourage retailers to actively carry products and provide services we use. We desire that manufacturers continue to develop exciting new products to make our family and personal communication more efficient. What we hope for is that every retailer, manufacturer and radio service shop behaves in a professional manner so that they do not contribute to GMRS deleteriously. We suggest retailers, manufacturers, and service shops subscribe to this simple Code of Conduct. The GMRS Web Certified Retailer button is used by retailers and manufacturers on their websites so they can show they subscribe to the spirit of this code. GMRS Web will not verify adherence to the code. We will rely on the honesty and integrity of each vendor displaying the emblem. Your comments on the development of this code are appreciated. Send them to ethics@gmrsweb.com

- Honesty and accuracy in advertising. Avoids misleading, false, inaccurate, or exaggerated claims. Maintains the integrity of every commercial message from the marketing sell sheet to the helpful advice and counsel of the retail sales person. Is always forthright and informative to every customer seeking product advice or support.
- Advertising for Family Radio Service radios includes a statement that the radios may not be used in foreign countries except Canada, specifically that the radios, can only be used where the FCC has jurisdiction over radio regulatory matters.
- Recognizes GMRS as a radio service of personal licensees. Never rents, sells, or leases GMRS equipment to persons or businesses not intending to properly license in the appropriate radio service. Never leases GMRS repeaters or radio systems to businesses not eligible to license in GMRS. Never recommends to businesses that the eight main repeater pairs in GMRS are eligible for use by businesses and their employees. Never builds, installs, or recommends that businesses use GMRS repeater input or interstitial channels for business simplex systems.
- Knows the FCC Rules and Regulations for GMRS as the rules apply to type acceptance, manufacturing, sales, marketing, and the day to day use of GMRS by licensees.
- Charges a fair market price. A fair market price enables a business to make a fair profit in order to remain in business providing services and products to GMRS licensees well into the future.
- Whenever possible, provides instructions to, or refers new radio buyers to, the process of FCC licensing in GMRS or other appropriate radio service.

- Makes every reasonable effort to resolve customer complaints about products or services.
- Does not advocate or sell radio equipment for the express purpose of encouraging illegal operation or modification of that equipment. e.g. out of band CB.
- Explains in product documentation that operation on GMRS channels is PROHIBITED North of Line A near the Canadian border and anywhere outside the USA where the FCC does not have jurisdiction over radio regulatory matters.

D. The magazine was the first organization to identify the problem of International radio piracy on GMRS channels in U.S. waters by ships using GMRS frequencies allocated to maritime services in other parts of the world. (Asia and the United Kingdom) All such cases were reported to the FCC Enforcement Bureau for action. The Northern California FCC Field Office was exceptional in handling such cases located in the Port of Benicia, Ca.

E. The editorial section of the magazine coined the term "bubble-pack pirates" over three years ago to define the hordes of unlicensed operators using inexpensive fifteen-channel two-way radios on GMRS channels. This problem first surfaced when these GMRS radios appeared in bubble-pack packaging at local electronics stores. Retailers routinely sold the GMRS units as license free and license requirements were missing, confusing, or in very small print on the packaging.

Low cost fifteen channel GMRS radios operated by unlicensed users generated some interference to licensees. The interference problem was greatly exacerbated after the Commission approved the sale of the so-called twenty-two channel GMRS/FRS hybrid radios of the type Garmin is expected to use with their GPS technology on GMRS channels.

In creating the twenty-two channel GMRS/FRS hybrid radio the Commission itself created an enforcement problem that licensees recognize is impossible to solve through the FCC's own Enforcement Bureau. These twenty-two channel radios, a combination of GMRS channels and all fourteen FRS channels are sold by companies like RadioShack as license free on FRS but a license is required on GMRS - *if those channels are used.* The magazine has always held that these twenty-two channels radios are just as much GMRS radios as the fifteen-channel radios were and that mere possession of this radio implies that the user will use GMRS channels regardless. The person using a twenty-two channel radio should have a GMRS license. The two-way radio industry believes something entirely different. Why? Because it helps them sell radios. This is a very gray area that the Commission apparently never considered when authorizing the manufacture of a radio that included license free channels and channels that required a license. Hundreds of thousands of these twenty-two channel GMRS/FRS hybrid units are now in use without a license creating interference on local levels that other petitioners to the FCC have shown can severely cripple communication.

F. The magazine recognized at least three years ago that FRS operations can and do severely interfere with GMRS systems despite the Commissions own assertion that the

Commission had had no reports of such interference. We documented interference to repeater systems in our own test conducted by Paul Shinn, PE, also an owner of a GMRS repeater and a Technical Editor of this magazine. Gregory Forrest of the Northern California GMRS User Group and a Technical Editor of this magazine dealt very effectively with the engineering aspects of this interference in his current and prior comments on Garmin's proposals. There are GMRS repeaters in many American cities plagued with FRS interference. Surprisingly, the FCC and Garmin never commented on Mr. Forrest's assertions or his proposed solutions to prevent even greater levels of interference from Garmin's GPS transceivers on GMRS channels. We find that deeply troubling.

Despite the interference from FRS, the GMRS community has however encouraged and embraced the development and use of license free FRS radios for families. Interference has been begrudgingly tolerated or mitigated on a local level through some improvement of GMRS radio systems and user education. The magazine has played a role in educating FRS users and GMRS licensees. GMRS systems are family systems however and not commercial systems backed by huge budgets so engineering improvements directed at narrow banding has been slow. Increased interference to GMRS repeater systems from FRS radios operating on channels seven through 14 has increased significantly.

G. The magazine technically reviewed some of the early bubble-pack GMRS radios. One of those units was incapable of transmitting at the advertised two-watt power level. It did for a millisecond as the supply voltage was increased then went silent forever. The radio barely delivered one watt with battery power. Readers of the magazine were aghast that the Commission allowed such devices to be approved without adequate proof that the devices met advertised specifications. Manufacturers appear to be entirely on their own to certify technical compliance with the rules. We suspect that many of the now so-called "7-mile" radios may fit this category. Grandiose claims are made about the effectiveness of these little GMRS radios to increase sales but the consumer is left holding a radio that couldn't possibly live up to the claim. The FCC's approval of inexpensive twenty-two channel hybrid GMRS/FRS radios has been the bane of the General Mobile Radio Service.

Comments

1. These comments are intended to inform the Commission that the readers of PopularWireless Magazines want the FCC to seriously consider the frustrations and concerns of current GMRS licensees regarding petitions like Garmin's. Current interference levels from unlicensed use are intolerable and the Commission should take no action that would increase the problem exponentially.

PopularWireless Magazines has gone on record as supporting advanced technologies like Garmin's GPS use of the first seven channels of the Family Radio Service, but readers of the magazine are ***very concerned*** that this petition will be handled like other FCC decisions considered previously and result in continued and increased interference levels

to licensees rendering the General Mobile Radio Service useless to everyone. Increased inference levels are not in the public interest, convenience, or necessity.

2. It is my understanding after discussing GMRS with an FCC official that the Commission, has for some time had on its informal agenda, the intention to delicense GMRS by rule. I believe, as do many of the participants of the magazine forums that the FCC has aligned its actions and decisions with the market place to expand and change the GMRS fully aware that the changes would conflict with existing use. The FCC apparently believes new technologies and the economies of scale for the mass-marketing of bubble-pack two-way radios take precedence over existing use. The conflict appears to current licensees as quite intentional on the FCC's part. This may, in part, be one explanation for the interminable wait some licensees have experienced in the resolution of some enforcement matters. Why should the FCC provide enforcement if the service will soon be delicensed? Everyone, including the FCC is confused.

The conflict would however, make it easier for the Commission to delicense by rule when the right time came. We believe that the FCC's concerns over the economic development of what the FCC might consider an under-utilized spectrum resource motivated and encouraged the FCC to make what we consider illogical enhancements to the General Mobile Radio Service that could severely limit or interfere with existing use.

The FCC's actions conflict with the FCC's Congressional mandate to enforce its own licensing, operating, and technical rules and regulations. Again, the FCC permitted the creation of inexpensive twenty-two channel radios that included all FRS and GMRS channels. These radios are routinely sold as license free radios by retailers if the radios are operated by the consumer on only the FRS channels. The logic of this notion escapes all rational licensees since every one of these radios eventually ends up transmitting on a GMRS channel. In the FCC's view the public interest was served when in fact the exact opposite took place.

The FCC allowed the two-way radio industry to create a hybrid GMRS radio that has thoroughly confused the mass consumer and the retailing industry. Hundreds of thousands of these twenty-two channel GMRS radios are now in use on GMRS channels by families that have not and do not intend to license the radios. Licensees cope with unlicensed use every day and wonder why the Commission did what it did.

3. We believe that extending to Garmin the right to put GPS data on GMRS channels has already been done informally by the Commission whether or not a need for such a change has been shown by Garmin. Many licensees contend that since the FCC allowed Garmin to put the data functionality in what licensees already considered to be a GMRS radio that tacit approval has been made without regard for predicted interference levels. Garmin applied for a waiver to use its GPS data on FRS channels. Licensees never expected to see the functionality appear in a radio that also included GMRS channels. What we expected was to see the functionality in an FRS radio. What happened?

We understand that the functionality was only on FRS frequencies but we still consider the twenty-two channel GMRS/FRS hybrid to be a GMRS radio. We hold that unlicensed users should not be transmitting with twenty-two channel GMRS/FRS hybrid equipment, but *thanks to the Commission*, the proper operation of these devices by individuals is unclear and improper operation is now completely unenforceable because of the overwhelming number of twenty-two channel units that have already been sold.

Our feelings in this matter are also promulgated by the Commission's lack of response to filings made by this magazine and other GMRS licensees related to Garmin's first proposal. Whatever discussions are occurring with industry representatives related to the modifications of the GMRS Rules seem to be occurring outside of the formal regulatory process with very little concern for the opinions of existing GMRS licensees.

4. We are confused about the Commission's intent. We know what Garmin wants to do and in general we have demonstrated that we support the new GPS technology; however, we want the FCC and the two-way radio industry to create technologies that serve the public interest, convenience, and necessity. We do not want technologies that interfere with or prevent existing licensees from using their family GMRS systems.

In fact, the current Garmin proposal advocates increasing and accepting unlicensed use of GMRS channels by other than voice oriented communication. Garmin seeks to obtain an exemption to allow the user of its higher-powered product not to send an FCC assigned call sign while auto polling. This is going to be translated by the general public and the retailers as "no license required." People will not bother to obtain licenses since sending a call sign is not necessary. There is also no provision in the proposal for pre-transmission monitoring. Taking such a position in the face of already increasing interference levels is not in the public interest. The absence of a call sign ID makes user-community-supported resolution of interference problems difficult if not impossible.

Licensees have expressed their sentiments in the magazine forums clearly. We either take steps to minimize the carnage now or we simply give up on the service and abandon it. Licensees generally agree with the Commission that the FRS and GMRS are voice based radio services focused on directed communication between individuals in groups or between family members. Licensees know that the unlicensed use of twenty-two channel GMRS/FRS hybrid radios is beyond control.

The magazine supports the proposals made by Gregory Forrest, P.E. in the comments he makes in this filing on behalf of the Northern California GMRS User Group. In general, all data transmissions should be identified by an FCC assigned call sign. The data transceiver must protect other users of the same frequency. The radio cannot transmit if channel activity is present. Commercial use of the technology, other than by individuals as defined in the FCC GMRS rules, should be prohibited.

We strongly suggest that the Commission ascertain from Garmin if a genuine need has actually been established to use GMRS channels and higher power for this purpose or if expansion into GMRS is simply a marketing plan to increase sales. Perhaps the petition

should not even be pursued if a genuine need cannot be demonstrated. Garmin's desire to have higher powered units with only a vague indication that their GPS two-way radios have had wide public acceptance is simply marketing language. In the time the Garmin Rino has been available I have never seen one in use and never met anyone that has ever used one.

I am not impressed with Garmin's language regarding the use of the Rino geo-locating device to wit:

> **"4. Amendment of the GMRS rules as proposed by Garmin will greatly enhance the GMRS by providing a simple, non-interfering and non-intrusive means for transmitting accurate and critical location information on certain CMRS channels. The instantaneous transmission of accurate location information over greater areas than that possible by using FRS frequencies would help to protect the safety of lives and property, and provide additional safety and security. All of these goals can be achieved while maintaining the integrity of the GMRS rules and operations, and remaining within the purposes for which the GMRS was created."**

In the Northern California GMRS User Group response to Garmin's first proposal Gregory Forrest detailed a fairly accurate picture of the interference levels currently being experienced on GMRS and FRS today. Knowing the current interference levels a reasonable person would hardly choose to formally rely upon a data sending device using GMRS or FRS to protect public safety, lives and property.

The editorial position of this magazine has been to argue against such uses as incompatible under the circumstances. We argued against using FRS channel 1 for emergency calling and monitoring as well as using 462.675 MHz as a so-called emergency channel. It is highly likely that data transmissions are going to attract the attention of unlicensed children who will play call tones, sing, or yell, in order to annoy the holder of the data device. It is even more likely in a suburban or urban area that another unlicensed user transmits without monitoring and never hears the data burst simply because the user is using Continuous Tone Coded Squelch. In my opinion, Garmin is not acting in the public interest by suggesting that the geo-locating device can be used on GMRS OR FRS to protect lives and property when the current level of unlicensed use and significant lack of operator sophistication causes so much interference. It is presumptuous to assume these frequencies can be used for public safety communication.

The Garmin device may only be non-interfering if it meets the specifications suggested in this and the NCUG comments. As Garmin's petition stands now the claims of a non-interfering system are not valid.

5. Licensees are very concerned about the device itself. The Commission should be looking far more carefully at the advertised specifications of low-cost GMRS bubble-pack radios and determining whether or not the device can actually live up to those

specifications. Licensees are not confident that power levels and frequency tolerance specifications are being adhered to. What provision does the FCC have to verify whether or not Garmin's GMRS unit would perform as advertised? Will the FCC consider having it's engineers randomly test GMRS radios off the shelf to verify compliance with the rules?

6. Licensees are at a loss to understand where the Commission is taking the GMRS and why it has taken actions that clearly have expanded its use in favor of industry but in such a negative way for licensees. We are also very concerned about Commission actions that may be directed toward creating conditions in the service that moves toward complete delicensing by rule and at that point total anarchy.

Licensees feel that the Commission's experience with 27 MHz CB and the circumstances of unlicensed frequency use in the Business Radio Service that involved the creation of the Multi-Use Radio Service would have caused the Commission to take a more cautions approach in rule making. We remind the Commission that while it believes it has a responsibility to develop spectrum resources in the public interest it also has the responsibility to enforce its own rules and regulations. We encourage the Commission to actively involve it's own Enforcement Bureau in decisions that impact enforcement so as to avoid situations where new rules, regulations, or approved technologies fly in the face of the Commission's enforcement duty. The colloquial expression might be, "Don't put the top-notch folks in the Enforcement Bureau in-between a rock and hard place because you didn't adequately think through a problem."

7. Specifically the editorial position of the magazine is that it supports:

a. An authorized bandwidth of 8 KHz for F2D geo-location data transmissions from the Garmin device on the first seven FRS channels and six GMRS repeater output channels. We do not support text messaging only. Text messaging is an available feature on cellular telephones and by itself serves no useful purpose in GMRS or FRS. Such data transmissions would only serve to change the nature of the service from a reasonably reliable two-way voice radio service to a data radio service at the expense of existing communications systems.

b. F2D emissions should not exceed one watt from a hand-held device into a non-detachable antenna on GMRS channels.

c. If approved for GMRS, Garmin must accept eliminating the use of FRS channels seven through fourteen for F2D emissions. This will decrease the likelihood of an unattended device interfering with a GMRS repeater that has not yet been modified for narrow band use.

d. Morse code station identification is required for all F2D emissions on GMRS channels. An FCC license is required.

e. We support the NCUG comments regarding the prevention of co-channel interference but we suggest that if auto-polling is permitted it should enable only a single response from the polled unit with appropriate pre-transmission monitoring. We would oppose recurrent automatic polling transmissions just because the unit was addressed once. We reiterate NCUG's language here for 95.193(a):

"….Digital data communications are secondary to voice communications, and must protect voice communications through automatic methods. Data-capable transmitters must incorporate a transmitter lockout system to prevent data transmission when other co-channel signals are present. Timing of a data transmission following a lockout shall occur at a random time period after the channel is clear consistent with good engineering practice."

f. The packaging for the device should be distinctively labeled that an FCC license is required. We note that it might be time for the Commission to consider reducing the license fee and simplifying the on-line application so it can be performed on behalf of customers at a retail store or much more easily than it can be done now on the Universal Licensing System.

g. If the GMRS is to be expanded for public use in this fashion the FCC should seriously consider eliminating all grandfathered non-personal radio systems on GMRS channels within two years. These systems are incompatible with current and future use. Companies and organizations have had almost twenty years to move grandfathered non-personal radio systems on GMRS to business radio frequencies.

h. F2D geo-locating transmissions must be secondary to voice communication and this capability must be built into the geo-locating hardware itself.

In closing I want to add this personal comment. I have been a Commission licensee since I was sixteen years old. Achieving the status of licensee through testing in the broadcasting service (Third Class Radiotelephone with Broadcast Endorsement) and in Amateur Radio (Extra Class – 20wpm) meant a lot to me then and more so now. I always held the Commission and its employees in high regard and I can even count some as personal friends and acquaintances. The pride I take in having been a Commission licensee for thirty-three years is considerable.

What I am asking the Commission to do is not let the GMRS licensee down. Extend to the licensee the same respect the licensees have extended to the Commission these many years. Those of us who licensed in GMRS did so because we wanted a radio service for our family activities. Building a proper GMRS system took time and money. We are ready to grow and use new technologies but we would like the FCC to remain as steadfast as it once was in creating rules and regulations and observing policies that make sense. I am very concerned that the Commission is going to continue making decisions regarding

GMRS that will continue to minimize usability, maximize interference, and in turn eliminate public interest in GMRS altogether. It will in effect become a service full of mischief for boys with bubble-pack toys. I need only point to the 27 MHz Citizens Band to make my point. Please accept my comments in this spirit.

Respectfully,

Doug Smith

Digitally signed by Doug Smith
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